PART 70 OPERATING PERMIT

OFFICE OF AIR MANAGEMENT

and

Evansville EPA

Innovative Packaging Solutions
1405 West Missouri Street
Evansville, Indiana 47710

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-5859-00010	
Issued by: Janet McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

Testing Requirements [326 IAC 2-7-6(1)]

C.11 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
C.13 Monitoring Methods [326 IAC 3]
C.14 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]
C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)]
C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Rotogravure Printing Presses 1 through 6

D.2 FACILITY OPERATIONS CONDITIONS - Rotogravure Printing Press 7, a drying oven and a adsorber/oxidizer

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 2-2] and [326 IAC 8-1-6]
D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-5(1)]

D.2.4 Adsorber with Oxidizer

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements
D.2.6 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - One (1) Parts Washer (RINZ 1), consisting of a Distillation unit, a Decanter, and two (2) Comco Flexographic press

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]
D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
D.3.3 NESHAP - Halogenated Solvent Cleaning [40 CFR 60, Subpart T]

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS - Chrome Plating and Dechrome Tank

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]
D.4.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]
D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13]
D.4.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Monitoring to Demonstrate Continuous Compliance [40 CFR63.343 (c)(1)]
D.4.6 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63.344]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping and Reporting Requirements [40 CFR 63.346]
D.4.8 Reporting Requirements [40 CFR 63.345 & 63.347]

Certification Form
Emergency/Deviation Occurrence Report
Quarterly Compliance Report Form
Quarterly Report Forms
Chromium Electroplating Compliance Status Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and Evansville EPA. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a printing plant, which manufactures glueless paper, foil film and metallized paper labels.

Responsible Official:	Allan C. Bartnik
Source Address:	1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address:	same
SIC Code:	2754
County Location:	Vanderburgh
County Status:	Attainment for all the criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under the PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This printing source consists of the following emission units, pollution control devices:

(1) Rotogravure printing press no. 1, which has a maximum printing capacity of 70,889 million square inches per year ($MMin^2$/yr),

(2) Rotogravure printing press no. 2, which has a maximum printing capacity of 92,214 $MMin^2$/yr,

(3) Rotogravure printing press no. 3, which has a maximum printing capacity of 70,889 $MMin^2$/yr,

(4) Rotogravure printing press no. 5, which has a maximum printing capacity of 70,889$MMin^2$/yr, and

(5) Rotogravure printing press no. 6, which has a maximum printing capacity of 70,889 $MMin^2$/yr.

(6) W.A. Chesnut (Series 300) rotogravure press no. 7, which has a maximum printing capacity of 192,370 $MMin^2$/yr, utilizing a natural gas-fired adsorber with an oxidizer, identified as (PL1) M&W Re-Gensorb (Model 30000), for VOC control.

(a) One (1) natural gas-fired drying oven consisting of eleven (11) burners with a total heat input capacity of 5.5 million Btu per hour (mmBtu/hr),

(7) One (1) parts washer, identified as RINZ 1, which consists of one (1) distillation unit, and one (1) decanter and one (1) chamber for parts cleaning. This facility is controlled by the adsorber/oxidizer (PL1).

(8) Two (2) Comco UV Flexographic printing presses #1 and #2, each has a maximum rate of 750 feet per minute using UV inks only and exhausting out a 12 inch diameter, 26 foot tall stack at 4180 CFM.

(9) One (1) dual hard chrome plating tank, identified as CT196, which is rated at 2000 ampere rectifier, controlled by a composite mesh pad system (CMP).

(10) One (1) hard chrome dechrome tank, identified as #DCT196, with a 500 ampere rectifier

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)].

This rotogravure printing source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour,

(2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour,

(3) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr,

(4) Combustion source flame safety purging on startup,

(5) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons,

(6) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids,

(7) Packaging lubricants and greases,

(8) Application of oils, greases, lubricants, or other nonvolatile, materials applied as temporary protective coatings,

(9) Machining where an aqueous cutting coolant continuously floods the machining interface,

(10) Degreasing operations that do not exceed 145 gallons of solvent (petroleum naptha) per 12 months, except if subject to 326 IAC 20-6,

(11) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment,

(12) Closed loop heating and cooling systems,

(13) Rolling oil recovery systems,

(14) Solvents recycling systems with batch capacity less than or equal to 100 gallons.

(15) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs,

(16) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs,

(17) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,

(18) Trimmers that do not produce fugitive emission and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone,

(19) Paved and unpaved roads and parking lots with public access,

(20) Equipment used to collect any material that might be released during malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment,

(21) Blowdown for any of the following: sight glass; boiler, compressors, pumps; and cooling tower,

(22) On-site fire and emergency response training approved by the department,

(23) Gasoline generators not exceeding 110 horsepower, and

(24) Stationary fire pumps.

(25) One (1) water wash tank, which has a capacity of 300 gallons,

(26) One (1) water heating tank, which has a capacity of 300 gallons,

(27) One parts washer using caustic soda, which has a capacity of 2,000 gallons,

(28) Filling drums, pails or other packaging containers with lubricating oils, waxes, greases,

(29) Exposure chambers (“towers”, “columns”), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge, and

(30) Ink dispensing / mixing room.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This rotogravure printing source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).
(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”.

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in
IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Evansville EPA.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

(c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Evansville EPA.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

Indiana Department of Environmental Management

Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

(b) The Permittee shall furnish to IDEM, OAM, and Evansville EPA within a reasonable time, any information that IDEM, OAM, and Evansville EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, and Evansville EPA copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and Evansville EPA along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, Evansville EPA or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness.

This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015,
Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and Evansville EPA local agency when applicable) may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM, and Evansville EPA. IDEM, OAM, and Evansville EPA may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and Evansville EPA, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, and Evansville EPA may require that the Preventive Maintenance Plans required under 2-7-4(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, and Evansville EPA by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) f an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and Evansville EPA shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and Evansville EPA has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and Evansville EPA has issued the modification. [326 IAC 2-7-12(b)(7)].

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and Evansville EPAdetermines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, and Evansville EPA to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and Evansville EPA at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and Evansville EPA may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and Evansville EPA shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.

(2) If IDEM, OAM, and Evansville EPA, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and Evansville EPA, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and Evansville EPA any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, and Evansville EPA fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015,

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and Evansville EPA in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(i) A brief description of the change within the source;

(ii) The date on which the change will occur;

(iii) Any change in emissions; and

(iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, Evansville EPA or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and Evansville EPA U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of

permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, and Evansville EPA within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, Evansville EPA, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Major Source Status [326 IAC 2-2] [40 CFR 52.21]

The source is an existing major source, pursuant to 326 IAC 2-2, the Prevention of Significant Deterioration, (PSD) and 40 CFR 52.21.

C.2 Overall Source HAPs Limit [40 CFR Part 63, Subpart KK]

(1) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per 12-month period rolled on a monthly basis; and

(2) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per 12-month period rolled on a monthly basis.

Compliance with condition C.2(1) and (2) will make the NESHAP, 40 CFR Part 63, Subpart KK - National Emissions Standards for the Printing and Publishing Industry not applicable.

C.3 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.5 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.6 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.

C.7 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.8 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.11 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM and Evansville EPA within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, and Evansville EPA, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 6, 1992.

(b) If the ERP is disapproved by IDEM, OAM, and Evansville EPA the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM, and Evansville EPA that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, and Evansville EPA that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, and Evansville EPA that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM, and Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, and Evansville EPA within thirty (30) days of receipt of the test results.

The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM and Evansville EPA shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM and Evansville EPA within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM and Evansville EPA reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM and Evansville EPA that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM and Evansville EPA may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

(c) The annual emission statement equired by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM, and Evansville EPA may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and Evansville EPA representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and Evansville EPA within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.Section D

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

(1) Rotogravure printing press no. 1, which has a maximum printing capacity of 70,889 million square inches per year ($MMin^2$/yr),

(2) Rotogravure printing press no. 2, which has a maximum printing capacity of 92,214 $MMin^2$/yr,

(3) Rotogravure printing press no. 3, which has a maximum printing capacity of 70,889 $MMin^2$/yr,

(4) Rotogravure printing press no. 5, which has a maximum printing capacity of 70,889$MMin^2$/yr, and

(5) Rotogravure printing press no. 6, which has a maximum printing capacity of 70,889 $MMin^2$/yr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Due to the date of construction, there are no applicable requirements for these facilities.

Section D.2 FACILITY OPERATION CONDITIONS

(6) W.A. Chesnut (Series 300) rotogravure press no. 7, which has a maximum printing capacity of 192,370 $MMin^2$/yr, utilizing a natural gas-fired adsorber with an oxidizer, identified as (PL1) M&W Re-Gensorb (Model 30000), for VOC control.

(a) One (1) natural gas-fired drying oven consisting of eleven (11) burners with a total heat input capacity of 5.5 million Btu per hour (mmBtu/hr),

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compound (VOC) [326 IAC 2-2] and [326 IAC 8-1-6]

The VOC input usage before control to Press 7 and the usage of cleanup solvent for the Press 7 (the usage of cleanup solvent may need to take into account any recycling of cleanup and reused solvent) shall be limited to 1,203 tons per 12- month period rolled on a monthly basis. This limitation will prevent the VOC emissions from the Press 7 being greater than 39 tons per 12-month period. This limitation is based upon the use of the adsorber/oxidizer with an overall efficiency of 86%, and VOC offsets of 129 tons per year from the removal of the rotogravure printing press #4 as referenced in Construction Permit CP163-5017, issued on April 20, 1996. Compliance with this condition will make 326 IAC 2-2, PSD rule not applicable, and also satisfies the requirements under 326 IAC 8-1-6.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the press 7 and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee shall perform compliance stack test on the adsorber/oxidizer within 2.5 years of the issuance of this permit. These tests shall be performed according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

Compliance Monitoring Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-5(1)]

D.2.4 Adsorber with Oxidizer

When operating, the adsorber/oxidizer shall maintain the operating parameter (operating temperature, and fan amperage) determined in the most recent compliance stack tests to reduce the VOC emissions from the capture system of press 7 by at least 90% by weight, in conjunction with the emission control system to attain an overall control efficiency of 86%. These operating parameters shall be continuously monitored and recorded whenever the facility is in operation. In the event of malfunction of the continuous recorder, to the extent practicable, intermittent monitoring of the parameters shall be implemented at intervals no less than one hour until such time as the continuous monitor is back in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)]

D.2.5 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1. To document compliance with Conditions D.2.4, the Permittee shall maintain continuous records in accordance with (6) below.

(1) The amount and VOC content of each printing material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(6) The adsorber/oxidizer's operating temperature and fan amperage.

(b) To document compliance with Condition 2.1, the Permittee shall maintain a log of daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(d) Also, records indicating printing press #4 in the north building has been removed shall be submitted to this office as referenced by Construction Permit CP 163-5017, issued on April 20, 1996. The removal of printing press #4 is equivalent to reducing VOC emissions by 129 tons per year.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

(9) One (1) Parts washer (RINZ 1), consisting of one (1) distillation unit capable of processing in batch mode 43 gallons of solvent per hour and with a capacity of 158 gallons of solvent, one (1) decanter which stores 396 gallons of solvent, and one (1) chamber for parts cleaning. This facility is controlled by the adsorber/oxidizer (PL 1).

(10) Two (2) Comco UV Flexographic printing presses #1 and #2, each has a maximum rate of 750 feet per minute using UV inks only and exhausting out a 12 inch diameter, 26 foot tall stack at 4180 CFM.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operation), for operating the cold cleaner/parts washer (RINZ1), the source shall:

(a) equip the cleaner with a cover;

(b) equip the cleaner with a facility for draining cleaned parts;

(c) close the cleaner cover whenever parts are not being handled in the cleaner;

(d) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) provide a permanent, conspicuous label summarizing the operating requirements; and

(f) store waste solvent only in covered containers and not dispose or transfer waste solvent in any manner in which greater then twenty percent (20%) of the waste solvent by weight can evaporate into the atmosphere.

D.3.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Any change or modification made to the Como UV flexographic printing press which may increase its potential VOC emissions to 25 tons per year will require prior approval and be subject to the requirements of 326 IAC 8-1-6.

D.3.3 National Emissions Standards for Hazardous Air Pollutants (NESHAP): Halogenated Solvent Cleaning 40 CFR Part 60, Subpart T

Any change in the use of Ethyl Acetate as the cleaning solvent from the Parts Washer (RINZ 1) to any halogenated solvent shall be subject to this NESHAP and needs prior approval.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

(a) To document compliance with Conditions D.3.2 and D.3.3 the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits or the VOC emission limits established in Condition D.3.2, and the NESHAP established in Condition D.3.3.

(1) The amount and VOC content of the ink and solvent used by the Como flexographic printing press. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(2) The type of cleaning solvent used by the Parts washer (RINZ 1). Records shall include material safety data sheets (MSDS) necessary to verify the type used.

(3) A log of the dates of use.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

(11) One (1) dual hard chrome plating tank, identified as CT196, which is rated at 2000 ampere rectifier, controlled by a composite mesh pad system (CMP).

(12) One (1) hard chrome dechrome tank, identified as #DCT196, with a 500 ampere rectifier.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart N.

D.4.2 Chromium Electroplating NESHAP [326 IAC 20-8-1] [40 CFR Part 63, Subpart N]

The hard chrome plating facility, CT196 is subject to 40 CFR Part 63, Subpart N, which is incorporated by reference as 326 IAC 20-8-1. A copy of this rule is attached.

(a) The Permittee shall not allow the concentration of total chromium in the exhaust gas stream discharged to the atmosphere from the stack of CT196 to exceed 0.015 milligrams of total chromium per dry standard cubic meter (mg/dscm).

(b) The following work practice standards for CT196 are also applicable:

(1) At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain CT196, including the composite mesh pad system and monitoring equipment, in a manner consistent with the Operation and Maintenance Plan (OMP) required by Condition D.4.4.

(2) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the OMP required by Condition D.4.4.

(3) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to IDEM, OAM, and Evansville
EPA which may include, but is not limited to, monitoring results; review of the OMP, procedures, and records; and inspection of the source.

(4) Revisions may be required if IDEM, OAM and Evansville EPA finds that the plan:

(A) Does not address a malfunction that has occurred;

(B) Fails to provide for the operation of CT196, the air pollution control techniques, or the composite mesh pad system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or

(C) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan (PMP), in accordance with the Section B condition entitled "Preventive Maintenance Plans" of this permit is required for CT196 and the composite mesh pad system.

D.4.4 Operation and Maintenance Plan [40 CFR 63.342(f)(3)]

(a) An Operation and Maintenance Plan (OMP), in accordance with 40 CFR 63.342(f)(3) shall be prepared and maintained and shall specify the operation and maintenance criteria for CT196, the composite mesh pad system, and monitoring equipment, and shall include the following elements:

(1) Quarterly visual inspection of the composite mesh pad system to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device;

(2) Quarterly visual inspection of the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist;

(3) Quarterly visual inspection of the duct work from the tanks to the control device to ensure there are no leaks;

(4) Perform washdown of the composite mesh pads in accordance with manufacturer's recommendations.

(5) A standardized checklist to document the operation and maintenance criteria for CT196, the composite mesh pad system, and monitoring equipment;

(6) Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;

(7) A systematic procedure for identifying malfunctions of CT196, the composite mesh pad system, and monitoring equipment; and for implementing corrective actions to address such malfunctions;

(b) The Permittee may use applicable standard operating procedures (SOP) manuals, occupational safety and health administration (OSHA) plans, or other existing plans such as the PMP required in Condition D.4.3, as the OMP provided the alternative plans meet the criteria listed above in Condition D.4.4(a).

(c) If the OMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the OMP within forty five (45) days after such an event occurs. The revised plan shall include procedures for operating and maintaining CT196, the composite mesh pad system, and monitoring equipment, during similar malfunction events, and a program for corrective action for such events.

(d) If actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the OMP, the Permittee shall record the actions taken for that event and shall report by phone such actions within two (2) working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven (7) working days after the end of the event, unless the Permittee makes alternative reporting arrangements, in advance, with IDEM, OAM and Evansville EPA.

(e) The Permittee shall keep the written OMP on record after it is developed to be made available, upon request, by IDEM, OAM for the life of CT196 or until CT196 is no longer subject to the provisions of 40 CFR 63.340. In addition, if the OMP is revised, the Permittee shall keep previous versions of the OMP on record to be made available for inspection, upon request by IDEM, OAM for a period of five (5) years after each revision to the plan.

Compliance Determination Requirements

D.4.5 Monitoring to Demonstrate Continuous Compliance [40 CFR 63.343 (c)(1)]

(a) A performance test demonstrating initial compliance for CT196 was performed on November 22, 1996. It was determined that the average pressure drop across the system was 0.89 inch of water and the average outlet chromium concentration is 0.00986 mg/dscm.

(b) The Permittee shall monitor and record the pressure drop across the composite mesh pad system once each day that CT196 is in operation.

(c) The composite mesh pad system shall be operated within 2.00 ± 1 inch of water column, the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests that may be conducted in the future.

D.4.6 Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 63.344]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. Future tests that may be required shall be conducted in accordance with the provisions of 40 CFR 63.344.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.7 Record Keeping Requirements [40 CFR 63.346]

(a) The Permittee shall maintain records to document compliance with Conditions D.4.2 and D.4.4 using the forms provided with this permit. These records shall be maintained in accordance with the Section C condition entitled "General Record Keeping Requirements" of this permit, be kept for a period of five (5) years, and include a minimum of the following:

(1) Inspection records for the composite mesh pad system and monitoring equipment to document that the inspection and maintenance required by Conditions D.4.3 and D.4.4 have taken place. The record can take the form of a checklist and should identify the following:

(A) The device inspected;

(B) The date of inspection;

(C) A brief description of the working condition of the device during the inspection, including any deficiencies found; and

(D) Any actions taken to correct deficiencies found during the inspection, including the date(s) such actions were taken.

(2) Records of all maintenance performed on CT196, the composite mesh system and monitoring equipment.

(3) Records of the occurrence, duration, and cause (if known) of each malfunction of CT196, the composite mesh system and monitoring equipment.

(4) Records of actions taken during periods of malfunction when such actions are inconsistent with the OMP.

(5) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the OMP.

(6) Test reports documenting results of all performance tests and all measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance.

(7) Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected.

(8) The specific identification of each period of excess emissions, as indicated by monitoring data, that occurs during periods of malfunction of CT196, the composite mesh pad system, and monitoring equipment.

(9) The specific identification of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of CT196, the composite mesh pad system, and monitoring equipment.

(10) The total process operating time of CT196 during the reporting period.

(b) Operating time for chrome electroplating is defined as that time when the rectifier is turned on and a part is in the tank. When there is no part in a tank for fifteen (15) or more minutes, that time will not be considered operating time; likewise, if the time between placing a part in the tank is less than fifteen (15) minutes, that time will be considered part of the operating time.

D.4.8 Reporting Requirements [40 CFR 63.345 & 63.347]

(a) In accordance with 40 CFR 63.345, a notification must be submitted to IDEM, OAM and Evansville EPA prior to any change, modification, or reconstruction of CT196 (including addition of duct work to the composite mesh pad system) or construction of a new facility or source (affected or nonaffected, as defined in 40 CFR 63.344(e)). Notification shall be submitted as soon as practicable, but no sooner than thirty (30) days before the date construction or reconstruction commences.

(b) In accordance with 40 CFR 63.347(c)(2), a notification of the date when construction or reconstruction was commenced shall be submitted to IDEM, OAM and Evansville EPA no later than thirty (30) calendar days after such date. In addition, a notification of the actual date of startup of the new or reconstructed facility or source shall be submitted to IDEM, OAM and Evansville EPA within thirty (30) calendar days after such date. Additional notifications required under 40 CFR 63.345 and 63.347 shall be specified as they become due.

(c) The Permittee shall notify IDEM, OAM in writing of their intention to conduct a performance test at least sixty (60) calendar days before the test is scheduled to begin. Reports of performance test results shall be submitted no later than forty-five (45) days following the completion of the performance test, and shall be submitted as part of a notification of compliance status as described in 40 CFR 63.347(e), to the address listed in the Section C condition entitled “Performance Testing” of this permit.

(d) The Permittee shall submit a summary report to document the ongoing compliance status of CT196 using the Ongoing Compliance Status Report form provided with this permit. The report shall contain the information specified in 40 CFR 63.347(g)(3) that is applicable.

(1) This report shall be submitted semiannually on a calendar year basis, unless otherwise directed by IDEM, OAM. The report shall be submitted within thirty (30) days after the end of each reporting period, which ends June 30 and December 31 respectively.

(2) If there are any exceedances of the chromium air emission limit contained in Condition D.4.2, then quarterly reports shall be submitted until a request to reduce reporting frequency, according to the procedures of 40 CFR 63.347(g)(2), is approved.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

and

EVANSVILLE EPA

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Emergency/Deviation Occurrence Reporting Form

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865
and
EVANSVILLE EPA
101 N.W. Martin Luther King, Jr. Blvd.
Room 250, Federal Building
Evansville, Indiana 47708
Phone: 812-426-5597

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(C) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report. State Form 47738 (5-96)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

and

EVANSVILLE EPA

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the dates of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.2.1, D.2.4, D.4.2, and D.4.5)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
EVANSVILLE EPA

Part 70 Permit Quarterly Report

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010
Facility: Press 7
Limit: 1, 203 tons of VOC /12 month total rolled on a monthly basis.

Year:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter

9 Deviation/s occurred in this quarter.
Deviation has been reported on : _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
EVANSVILLE EPA

Part 70 Permit Quarterly Report

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010
Facility: Press 7
Limit: 1, 203 tons of VOC /12 month total rolled on a monthly basis.

Year:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter

9 Deviation/s occurred in this quarter.
Deviation has been reported on : _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Permit Quarterly Report

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010
Facility: Sourcewide (presses 1 through 7)
Limit: Less than 10 tons of single HAP per 12-month period, rolled on a monthly basis
Less than 25 tons of combined HAPs per 12-month period, rolled on a monthly basis

Year _____

Month	Column 1	Column 2	Column 1 + Column 2	Column 1	Column 2	Column 1 + Column 2
	Single HAP Usage This Month	Single HAP Usage Previous 11 Months	Single HAP Usage 12 Month Total	Combined HAPs Usage This Month	Combined HAPs Usage Previous 11 Months	Combined HAPs Usage 12 Month Total
Month 1						
Month 2						
Month 3						

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Permit Quarterly Report

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010
Facility: Sourcewide (presses 1 through 7)
Limit: Less than 10 tons of single HAP per 12-month period, rolled on a monthly basis
Less than 25 tons of combined HAPs per 12-month period, rolled on a monthly basis

Year _____

Month	Column 1	Column 2	Column 1 + Column 2	Column 1	Column 2	Column 1 + Column 2
	Single HAP Usage This Month	Single HAP Usage Previous 11 Months	Single HAP Usage 12 Month Total	Combined HAPs Usage This Month	Combined HAPs Usage Previous 11 Months	Combined HAPs Usage 12 Month Total
Month 1						
Month 2						
Month 3						

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
and
EVANSVILLE EPA

PART 70 OPERATING PERMIT
CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

Source Name: Innovative Packaging Solutions
Source Address: 1405 West Missouri Street, Evansville, Indiana 47710
Mailing Address: 1405 West Missouri Street, Evansville, Indiana 47710
Part 70 Permit No.: T163-5859-00010
Tank ID #: CT196
Type of process: Hard
Monitoring Parameter: Pressure drop across the composite mesh pad system
Parameter Value: 2.00 ± 1 inch of water column
Limits: Total chromium concentration may not exceed 0.015 mg/dscm

This form is to be used to report compliance for the Chromium Electroplating NESHAP only.
The frequency for completing this report may be altered by the IDEM, OAM, Compliance Branch.

Companies classified as a major source: submit this report no later than 30 days after the end of the reporting period.
Companies classified as an area source: complete this report no later than 30 days after the end of the reporting period, and retain on site unless otherwise notified.

This form consists of 2 pages **Page 1 of 2**

BEGINNING AND ENDING DATES OF THE REPORTING PERIOD:	
TOTAL OPERATING TIME DURING THE REPORTING PERIOD:	
MAJOR AND AREA SOURCES: CHECK ONE	
9	NO DEVIATIONS OF THE MONITORING PARAMETER ASSOCIATED WITH THIS TANK FROM THE COMPLIANT VALUE OR RANGE OF VALUES OCCURRED DURING THIS REPORTING PERIOD.
9	THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES DURING THIS REPORTING PERIOD (THUS INDICATING THE EMISSION LIMITATION MAY HAVE BEEN EXCEEDED, WHICH COULD RESULT IN MORE FREQUENT REPORTING).

AREA (I.E., NON-MAJOR) SOURCES OF HAP ONLY:
IF DEVIATIONS OCCURRED, LIST THE AMOUNT OF TANK OPERATING TIME EACH MONTH THAT MONITORING RECORDS SHOW THE MONITORING PARAMETER DEVIATED FROM THE COMPLIANT VALUE OR RANGE OF VALUES.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

HARD CHROME TANKS / MAXIMUM RECTIFIER CAPACITY LIMITED IN ACCORDANCE WITH 40 CFR 63.342(c)(2) ONLY:
LIST THE ACTUAL AMPERE-HOURS CONSUMED (BASED ON AN AMP-HR METER) BY THE INDIVIDUAL TANK.

JAN	APR	JUL	OCT
FEB	MAY	AUG	NOV
MAR	JUN	SEP	DEC

CHROMIUM ELECTROPLATING NESHAP
ONGOING COMPLIANCE STATUS REPORT

ATTACH A SEPARATE PAGE IF NEEDED **Page 2 of 2**

IF THE OPERATION AND MAINTENANCE PLAN REQUIRED BY 40 CFR 63.342 (f)(3) WAS NOT FOLLOWED, PROVIDE AN EXPLANATION OF THE REASONS FOR NOT FOLLOWING THE PLAN AND DESCRIBE THE ACTIONS TAKEN FOR THAT EVENT:
DESCRIBE ANY CHANGES IN TANKS, RECTIFIERS, CONTROL DEVICES, MONITORING, ETC. SINCE THE LAST STATUS REPORT:
ADDITIONAL COMMENTS:

ALL SOURCES: CHECK ONE

9	I CERTIFY THAT THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE; AND, THAT THE INFORMATION CONTAINED IN THIS REPORT IS ACCURATE AND TRUE TO THE BEST OF MY KNOWLEDGE.
9	THE WORK PRACTICE STANDARDS IN 40 CFR 63.342(f) WERE NOT FOLLOWED IN ACCORDANCE WITH THE OPERATION AND MAINTENANCE PLAN ON FILE, AS EXPLAINED ABOVE AND/OR ON ATTACHED.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management
and
Evansville EPA

Technical Support Document (TSD) for Part 70 Operating Permit

Source Background and Description

Source Name:	**Innovative Packaging Solutions**
Source Location:	**1405 West Missouri Street, Evansville Indiana 47710**
County:	**Vanderburgh**
Operation Permit No.:	**T 163-5859-00010**
Permit Reviewer:	**Aida De Guzman**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Innovative Packaging Solutions relating to the operation of a printing plant used in the manufacture of paper, foil film, and metallized paper labels with no glue coated onto the back side of the substrate. Glues which make the labels adhere to the final product are applied by the end users of these labels.

Permitted Emission Units and Pollution Control equipment

The source consists of the following facilities/processes and their respective permits:

(A) Certificate of Operation # 010-KLC-001, issued on April 18, 1992 and renewed on April 18, 1997, by Evansville EPA:

(1) Rotogravure printing press no. 1, which has a maximum printing capacity of 70,881 million square inches per year ($MMin^2$/yr). This press was constructed in 1956,

(2) Rotogravure printing press no. 2, which has a maximum printing capacity of 92,214 $MMin^2$/yr. This press was constructed in 1957,

(3) Rotogravure printing press no. 3, which has a maximum printing capacity of 70,881 $MMin^2$/yr. This press was constructed in 1960,

(4) Rotogravure printing press no. 5, which has a maximum printing capacity of 70,881 $MMin^2$/yr. This press was constructed in 1967, and

(5) Rotogravure printing press no. 6, which has a maximum printing capacity of 92,214 $MMin^2$/yr. This press was constructed in 1968.

Note: There is no press identified as no. 4, because this press was removed to offset emissions from press no. 7, in order for the source to stay a minor source.

(B) Construction Permit CP 163-5017, issued on April 20, 1996, by the Office of Air Management (OAM):

(1) W. A. Chesnut (Series 300) rotogravure press no. 7, which has a maximum printing capacity of 192,370 $MMin^2$/yr. This press was constructed in 1996,

(2) One (1) natural gas-fired drying oven, which consists of eleven (11) burners with a total heat input capacity of 5.5 Million British Thermal Units per hour (mmBtu/hr),

(3) One (1) 5.0 mmBtu/hr natural gas-fired adsorber with an oxidizer, identified as (PL1) M&W Re-Gensorb (Model 30000). This control equipment controls the volatile organic compounds (VOC) emissions from the press no. 7 and from the drying oven. It was constructed in 1996.

(4) One (1) parts washer, identified as RINZ 1, which consists of one (1) distillation unit, and one (1) decanter, and one (1) chamber for parts cleaning. This facility is controlled by the adsorber/oxidizer (PL1),

(C) Certificate of Operation # I-1010-FLEX-008, issued on October 13, 1997, by Evansville EPA:

(1) Two (2) Como UV Flexographic printing presses #1 and #2 each has a maximum rate of 750 feet per minute using UV inks only and exhausting out a 12 inch diameter, 26 foot tall stack at 4180 CFM.

(D) Certificate of Operation # 010-KLC-005, issued on April 18, 1997, by Evansville EPA:

(1) One (1) dual hard chrome plating tank, identified as CT196, which is rated at 2000 ampere rectifier, controlled by a composite mesh pad system (CMP).

(2) One (1) hard chrome dechrome tank, identified as #DCT196, with a 500 ampere rectifier

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

The source also includes the following insignificant activities:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(3) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr.

(4) Combustion source flame safety purging on startup.

(5) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(6) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(7) Packaging lubricants and greases.

(8) Application of oils, greases, lubricants, or other nonvolatile, materials applied as temporary protective coatings.

(9) Machining where an aqueous cutting coolant continuously floods the machining interface.

(10) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(11) The following equipment related to manufacturing activities not resulting in the emissions of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(12) Closed loop heating and cooling systems.

(13) Rolling oil recovery systems.

(14) Solvents recycling systems with batch capacity less than or equal to 100 gallons.

(15) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.

(16) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(17) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(18) Trimmers that do not produce fugitive emission and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(19) Paved and unpaved roads and parking lots with public access.

(20) Equipment used to collect any material that might be released during malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(21) Blowdown for any of the following: sight glass; boiler, compressors, pumps; and cooling tower.

(22) On-site fire and emergency response training approved by the department

(23) Gasoline generators not exceeding 110 horsepower, and

(24) Stationary fire pumps.

(25) One (1) water wash tank, which has a capacity of 300 gallons

(26) One (1) water heating tank, which has a capacity of 300 gallons,

(27) One parts washer using caustic soda, which has a capacity of 2,000 gallons,

(28) Filling drums, pails or other packaging containers with lubricating oils, waxes, greases,

(29) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultraviolet coatings where heat is the intended discharge, and

(30) Ink dispensing / mixing room.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

A Part 70 permit application for the purposes of this review was received on May 13, 1996. Series of additional information was received on August 14, 30, 1996, and September 3, 1996. Air permits/approvals issued by Evansville EPA on new facilities were received on October 20, 1997. This information was incorporated in this Part 70 Operating permit application.

Enforcement Issues

The source has no outstanding enforcement actions (i.e. NOV's, Agreed Orders):

Emission Calculations:

(a) Rotogravure Printing Press 7 VOC Emissions: See Pages 1 of 4 through 3 of 4 TSD Appendix A.

(b) Combustion Emissions: See Page 4 of 4 TSD Appendix A

(c) Rotogravure Printing Press 7 HAPs Emissions: See Spreadsheet Pages 1 through 6.

Summary of Emissions (tons/year)				
Pollutant	Press 1 through 6	Press 7	Combustion	Total Potential Uncontrolled Emissions
PM = PM10	0.0	0.0	0.6	0.6
VOC	1,218	1,203	0.2	2,421.2
SO2	0.0	0.0	0.0	0.0
CO	0.0	0.0	1.0	1.0
NOx	0.0	0.0	4.6	4.6
Single HAP	97.9 each press 587.6 (for 6 presses)	9.55 controlled	0.0	587.6
Combined HAPs	103.1 each press 618 (for 6 presses)	10.05 controlled	0.0	628.1

Note: VOC and HAPs emissions from presses 1 through 6 are not controlled by the oxidizer.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	< 100
PM-10	< 100
SO_2	< 100
VOC	> 100
CO	< 100
NO_x	< 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP’s	Potential Emissions (tons/year)
Dibutyl Phthalate	> 10
Toluene	< 10
MIBK	< 10
Hexane	< 10
Diethyl Hexyl Phthalate	< 10
Methanol	< 10
MEK	< 10
TOTAL	> 25

(a) The potential emissions (as defined in the Indiana Rule) of Volatile Organic Compounds (VOC) are greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Combined HAPs
Presses 1 - 6	0.0	0.0	0.0	1,218	0.0	0.0	9.0	24.0
Press 7	0.0	0.0	0.0	39.0	0.0	0.0		
Total Emissions	0.0	0.0	0.0	1,257	0.0	0.0	9.0	24.0

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status (attainment/ severe, moderate, marginal, or maintenance nonattainment)
TSP	attainment
PM10	attainment
SO_2	attainment
Ozone	attainment
CO	attainment
NO_2	attainment

Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment for ozone.

Part 70 Permit Conditions

The Source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(1) New Source Performance Standards (NSPS):

(a) 40 CFR Part 60.430, Subpart QQ-Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing that commences construction after October 28, 1980-

Presses 1, 2, 3, 5 and 6 which are permitted under CP 010-KLC-001, issued on April 18, 1992 by Evansville EPA are not subject to this rule, because they were all constructed prior to the promulgation of the rule and are not used for publication rotogravure printing. These presses are used to print images upon various substrate: paper, foil, film, and metallized paper, which are used into packaging products and labels for articles to be sold (e.g. bottle and can goods, etc.).

Press 7 although it was installed in 1996, is not subject to this rule either because of the same reason for printers 1, 2, 3, 5, and 6.

(b) 40 CFR Part 60.440, Subpart RR-Standards of Performance for Pressure

Sensitive Tape and Label Surface Coating Operations - This rule only applies to pressure sensitive tape and labels where adhesive bond is formed on contact without wetting, heating or adding a curing agent. This company produces packaging product labels without any glue. Therefore, this rule is not applicable to the source.

(c) 40 CFR Part 60.580, Subpart FFF- Standards of Performance for Flexible Vinyl and Urethane Coating and Printing - This rule does not apply either because the company does not produce flexible product labels.

(2) National Emissions Standards for Hazardous Air Pollutants (NESHAP):

(a) 40 CFR Parts 63, Subpart N: The hard chrome plating facility, CT196 which replaced the existing chrome plating facility is subject to this NESHAP. The demonstration of compliance with this rule for this type of chrome plating was in January 25, 1997.

This rule mandates a limit of 0.015 milligram per dry standard cubic meter (mg/dscm) of exhaust air. The facility is controlled by composite mesh-pad (CMP) system.

The company has performed an initial stack test in November 22, 1996 to demonstrate compliance with this limit, by establishing operating parameters that correspond to this emissions limit. The stack test shows that the chrome plating operation is in compliance having emissions of 0.00986 mg/dscm, which is less than 0.015 mg/dscm. The regulation also specifies work practice standards, record keeping and reporting requirements.

Innovative Packaging Solutions is planning to continuously comply with this NESHAP.

(b) 40 CFR Part 63, Subpart T - National Emission Standards for Halogenated Solvent Cleaning. This NESHAP is not applicable to the degreasing operation of Innovative Packaging Solutions, because it utilizes water and caustic soda which are not halogenated solvents.

(c) 40 CFR Part 63, Subpart KK - National Emission Standards for Printing and Publishing Industry. This NESHAP applies to new and existing facilities that are major sources for HAPs at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated.

The source, which operates a product rotogravure is no longer subject to this NESHAP, since its single HAP and combined HAPs emissions were limited to 9 tons per year and 24 tons per year respectively.

State Rule Applicability

(1) 326 IAC 2-6 (Emissions Reporting)
This source is subject to this rule, because it is in Vanderburgh County and emits more than 10 tons per year of VOC. Pursuant to this rule, the owner/operator of this source must annually submit an emission statement of the source. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

(2) 326 IAC 2-2 (PSD Rule Requirements)
Rotogravure printing presses 1-6 have a potential VOC emissions of 1,218 tons/year. However, these presses were installed from 1956 through 1968, which predates August 7, 1977, the major source determination. For this reason, these presses were not subject to this rule.

The construction of the facilities under CP 163-5017 (press 7, carbon adsorber with oxidizer, drying oven and parts washer RINZ 1), issued on April 20, 1996, were subject to this rule, because their potential VOC emissions exceeded 40 tons per year.
CP 163-5017, conditioned the removal of printing press #4, which has a VOC emissions of 128.9 tons/year, that was used to offset the VOC emissions from these facilities, and the operation of the adsorber/incinerator to an overall control efficiency of 86 % brought down the VOC emissions to 39 tons per year. Compliance with these requirements made 326 IAC 2-2 not applicable.

(3) 326 IAC 8-5-5 (Graphic Arts Operations)

(a) Pursuant to 326 IAC 8-5-1(1), facilities or sources existing as of Nov. 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties are subject to 326 IAC 8-5-5; and

The source is not subject to this rule, because it is not located in the counties listed in the rule.

(b) Pursuant to 326 IAC 8-5-1(2), sources or facilities, construction of which commenced after November 1, 1980 located anywhere in the state are subject to 326 IAC 8-5-5.

The source is not subject to this rule, because it was existing prior to November 1, 1980.

(4) 326 IAC 8-6-1: (Organic Solvent Emission Limitation)

(a) Pursuant to Section (1) of this rule, existing sources as of January 1, 1980, located in Lake and Marion Counties with potential emissions of 100 tons per year of VOC not limited by other article 326 IAC 8, are subject to this rule.

The source is not subject to this rule, because it is not located in Lake and Marion Counties, although it was existing as of January 1, 1980 and emitting greater than 100 tons per year of VOC.

(b) Pursuant to Section (2) of this rule, sources commencing operation between October 7, 1974 and January 1, 1980, located anywhere in the state, with potential VOC emissions of 100 tons per year.

The source is not subject to this rule, because it was existing prior to October 7, 1974.

(5) 326 IAC 8-1-6: (General Reduction Requirements)

(a) Rotogravure printing presses 1-6, are not subject to this rule because they were constructed from 1956-1968, which predate the rule applicability.

(b) The Como UV Flexographic printing press, permitted under CP I-010-Flex-008, issued on October 13, 1997, is not subject to this rule either because its potential VOC emissions are less than 25 tons per year.

(c) W.A. Chestnut rotogravure printing press (press 7) is subject to this rule. In order to comply with this rule the source has installed a zeolite adsorber with a thermal incinerator.

A minimum overall control efficiency of 86% is necessary in order to avoid the requirements of PSD, 326 IAC 2-2.

Limit for Press 7 after control = 39 tons of VOC per year
Adding the VOC Offset emissions = 129 ton/yr
168 ton/yr
Overall Control Efficiency = 86%
VOC Limit before control = 168 ton/yr / 1-.86 = 1,203 tons/yr

(6) 326 IAC 8-3-2 (Cold Cleaner Operation)
Pursuant to 326 IAC 8-3-1, Sections 3 of this rule applies to new facilities constructed after January 1, 1980, performing organic solvent degreasing operation, located anywhere in the state.

The D.W. Renzmann parts cleaning system, which was constructed in 1996, is subject to 326 IAC 8-3-2 which mandates the owner or operator to operate the facility in the following manner:

(b) Equip the cleaner with a cover;

(c) Equip cleaner with a facility;

(c) Close the cleaner cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements; and

(f) Store waste solvent only in covered containers and not dispose or transfer waste solvent in any manner in which greater than twenty percent (20.0%) of the waste solvent by weight can evaporate into the atmosphere.

The company will operate this facility in conformance with the requirements of this rule.

(6) 326 IAC 2-1-3.4 (New Source Toxic Control Rule)

(a) The new Como UV Flexographic printing press which was permitted on October 13, 1997, that is after July 27, 1997 (applicability date of this rule) is not subject to this rule, because no HAP is emitted from this facility.

(b) Presses 1 through 6 are not subject to this rule, because they were constructed before July 27, 1997.

(c) Press 7 is not subject to this rule, because it was constructed before July 27, 1997. An oxidizer is installed however, for this press to stay below the 40 tons per year, significant level for PSD.

Compliance Monitoring:

The rotogravure printing press 7, adsorber/incinerator and the hard chrome plating (CT196) will require a Compliance Monitoring Plan.

The operation of this glueless paper, foil film, and metallized paper labels production plant will be subject to the conditions of the attached proposed **Part 70 Permit No. T163-5859-00010.**

Indiana Department of Environmental Management
Office of Air Management

and

Evansville EPA

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Innovative Packaging Solutions
Source Location: 1405 West Missouri Street, Evansville, Indiana 47710
County: Vanderburgh
SIC Code: 2754
Operation Permit No.: T163-5859-00010
Permit Reviewer: Aida De Guzman

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Indiana, stating that Innovative Packaging Solutions had applied for a Part 70 Operating Permit to operate a printing plant, which manufactures glueless paper, foil film and metallized paper labels. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions and clarifications to the permit and TSD (bolded language has been added, the language with a line through it has been deleted).

TSD Changes:

1. The following Limited Potential To Emit Table on page 6 of 10 of the Technical Support Document, which limits the VOC and HAPs emissions from the presses does not state the chromium emissions from the chrome plating operation. However, the PTE in this table took into account the chromium emissions (negligible), when the overall PTE was determined. See below calculations.

2. The single HAP PTE is also revised from 9 tons per year to 9.55 tons per year, since the after control single HAP is 9.55.

	Limited Potential to Emit (tons/year)							
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_X	Single HAP	Combined HAPs
Presses 1 - 6	0.0	0.0	0.0	1,218	0.0	0.0	~~9.0~~ **9.55**	24.0
Press 7	0.0	0.0	0.0	39.0	0.0	0.0		
Total Emissions	0.0	0.0	0.0	1,257	0.0	0.0	~~9.0~~ **9.55**	24.0

CT196 Hard Chrome Plating Emissions:

Capacity = 2,000 ampere; Hours of Operation = 10 hr/day * 6 day/wk * 52 wks = 3120 hr/yr
Emission Factor for Hard Chrome = 10 mg/1mp-hr

Chrome Emissions = 2000 amp * 10 mg/amp-hr * 3120 hr/yr * 2.2 x 10^{-6} lb/mg * ton/2000 lb
= 0.034 ton/yr * 8760 hr/yr /3120 hr/yr
= 0.09 ton/yr

Title V Permit Changes:

1. A Reporting Form was added in the Title V permit (page 46 of 48) to report the HAP usage in condition C.2 Overall Source HAP Limit on page 22 of 48 of the draft Title V permit. The HAP usage must be reported in order to demonstrate that HAP emissions stays at below ten tons/year and below 25 tons/year for combined HAPs, thus making 40 CFR Part 63, Subpart KK - National Emissions Standards for the Printing and Publishing Industry not applicable.

2. Condition D.2.3 Testing Requirements on page 33 of 48 of the draft permit is revised to clarify the schedule of the testing. The testing is required within 2.5 years of the permit issuance. Also, the testing rule citation should be 326 IAC 3-6, since 326 IAC 3-2.1 was repealed.

D.2.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee shall perform compliance stack test on the adsorber/oxidizer ~~after~~ **within 2.5** years ~~after~~ **of** the issuance of this permit. These tests shall be performed according to 326 IAC 3-~~2.1~~ **6** (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner. The Office of Air Management (OAM) shall be notified of the actual test date at least two (2) weeks prior to the date, a test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test, and all test reports must be received by the OAM within 45 days of completion of the testing, pursuant to that rule.

The OAM has made the following model changes.

1) The rule cite for ENSR has been removed from the second paragraph of the title page. This rule has been repealed.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 ~~and 326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Section B

1) B.1 (Permit No Defense) 326 IAC 2-1 has been repealed.

B.1 Permit No Defense ~~[326 IAC 2-1-10]~~ [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with ~~326 IAC 2-1-3.2 or~~ 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

2) B.9 (Compliance with Permit Conditions) the following language should be added to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable,** constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3) B.10 (Certification)has been revised since there are currently no certifications that would not be required to be certified by the Responsible Official.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**[326 IAC 2-7-5(3)(C)]**

(a) **Where specifically designated by this permit or required by an applicable requirement, any** ~~Any~~ application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

4) B.11(Annual Compliance Certification) delete (c)(5), OAM has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit. We have already received requests to take this out, and expect considerable more when sources do the first annual compliance certification.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**

~~(5) Any insignificant activity that has been added without a permit revision; and~~

~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and Evansville EPA local agency when applicable) may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

5) B.12 (Preventive Maintenance Plan) paragraph (b) and (c) have been revised.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, and Evansville EPA upon request and shall be subject to review and approval by IDEM, OAM, and Evansville EPA. **IDEM, OAM, and Evansville EPA may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

6) B.13 (Emergency Provisions) the rule cite in paragraph (e) has been revised to reflect the new Article 2 rule.

B.13 Emergency Provisions [326 IAC 2-7-16]

(e) IDEM, OAM, and Evansville EPA may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4-(c)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.

7) B.14 (Permit Shield) paragraph (d) has been revised to clarify the intent of the condition.

B.14 Permit Shield [326 IAC 2-7-15]

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and Evansville EPA has issued the modification. [326 IAC ~~2-7-12(b)(8)~~ **2-7-12(b)(7)]**

8) B.16 (Deviations from Permit Requirements and Conditions) paragraph (b)(3) has been revised to be consistent with B.12.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **such failure** has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

9) B.18(b)(1)(B) (Permit Renewal) 326 IAC 2-5 has been repealed.

B.18 Permit Renewal [326 IAC 2-7-4]

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and Evansville EPA on or before the date it is due. ~~[326 IAC 2-5-3]~~

10) Delete B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) and revise B.20(b) (Operational Flexibility) as follows. Both conditions refer to the same rule and it makes more sense for them to be combined.

~~B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]~~

~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

B.21 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC ~~2-1~~ 2-1.1 has been obtained;

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

(2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

~~(1)~~**(i)** A brief description of the change within the source;

~~(2)~~**(ii)** The date on which the change will occur;

~~(3)~~**(iii)** Any change in emissions; and

~~(4)~~**(iv)** Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

11) B.23 (re-numbered B.22)(Construction Permit Requirement) the referenced statute has been repealed therefore this condition has been revised.

B.22 Construction Permit Requirement [326 IAC 2]

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997,~~ A modification, construction, or reconstruction shall be approved ~~as~~ if required by and in accordance with **the applicable provisions of** 326 IAC 2.

12) B.23 (Inspection and Entry) in order to clarify confidentiality B.24 has been revised. OAM also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.

B.23 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, OAM, and Evansville EPA U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and Evansville EPA or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and Evansville EPA nor an authorized representative, may disclose the information unless and until IDEM, OAM, and Evansville EPA makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, and IDEM, OAM, and Evansville EPA acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

13) B.24 (Transfer of Ownership or Operation) 326 IAC 2-1 has been repealed therefore this condition has been modified.

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]~~

~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and Evansville EPA, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~

~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) IDEM, OAM,~~ and Evansville EPA shall reserve the right to issue a new permit.

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

14) B.25 (Annual Fee Payment) (b) has been revised.

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, and Evansville EPA within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, **Evansville EPA,** the applicable fee is due April 1 of each year.

(b) ~~Failure~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.

15) B.27 (Credible Evidence) This condition has been removed from the Tile V permits. IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

Section C

1) The following condition has been revised:

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor~~)~~ in a six (6) hour period.

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions Limitations~~ **Opacity Limitations**), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor~~)~~ in a six (6) hour period.

2) C.6(Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable.

C.6 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

3) C.8(Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

C.8 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this permit, ~~All~~ **all** air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

4) C.10 (Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule.

C.10 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

5) C.11 (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing.

C.11 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 N.W. Martin Luther King, Jr. Boulevard
Evansville, Indiana 47708-9998

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM and Evansville EPA within forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ **IDEM, OAM, and Evansville EPA**, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6) C.12 (compliance Monitoring) has been revised to clarify when compliance monitoring must begin.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than **ninety (90) days** after receipt of this permit~~. If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days**, the Permittee may extend the compliance schedule **related to the equipment for** an additional ninety (90) days provided the Permittee notifies:

7) C.13 (Maintenance of Monitoring Equipment) has been deleted. The C conditions have been renumbered.

~~C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

~~(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.~~

~~(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

8) C.13 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** ~~performed to meet the applicable requirements~~ of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

9) C.21 (General Record Keeping Requirements) (c)(4) has been modified to match B.12.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.Section D

Section D

1. Facility description box has been revised to clarify that descriptive information is not federally enforceable. If something about the description should be enforceable then it needs to be contained in a specific D condition.

Facility Description [326 IAC 2-7-5(15)] : insert facility description
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Reporting Forms

1) Emergency/Deviation Occurrence Report the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C).

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

9 2. This is a deviation, reportable per ~~326 IAC 2-7-5(3)(c)~~ **326 IAC 2-7-5(3)(C)**

- C The Permittee must submit notice in writing within ten (**10**) calendar days

Air Toxics Emissions Calculation Spreadsheet
Innovative Packaging Solutions
Aida De Guzman
May 13, 1996

ink Name	Amount used per unit (lb/unit)	Production units per hour (units/hr)	Annual Usage (tons/yr)	Dibutyl Phthalate Weight % (tons/yr)	Toluene Weight % (tons/yr)	Ethyl Benzene Weight % (tons/yr)	MIBK Weight % (tons/yr)	Hexane Weight % (tons/yr)	Diethyl Hexyl Phthalate Weight % (tons/yr)	Xylene Weight % (tons/yr)	Methanol Weight % (tons/yr)	MEK Weight % (tons/yr)	All Toxics (tons/yr)
Ink (Gold)-35844	17.01	21.96	1,636	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.06	0.00	0.01	0.01	0.00	0.00	0.18	0.00	0.26
Ink (Gold)-36374	20.44	21.96	1,966	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.06	0.00	0.01	0.01	0.00	0.00	0.22	0.01	0.31
Ink (Gold)-37747	21.79	21.96	2,096	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.07	0.00	0.01	0.01	0.00	0.00	0.23	0.01	0.33
Ink (Gold)-37751	21.61	21.96	2,079	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.07	0.00	0.01	0.01	0.00	0.00	0.23	0.01	0.33
Ink (Gold)-37867	20.49	21.96	1,971	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.06	0.00	0.01	0.01	0.00	0.00	0.22	0.01	0.31
Ink (Gold)-38146	17.40	21.96	1,674	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.05	0.00	0.01	0.01	0.00	0.00	0.19	0.00	0.27
Ink (Gold)-38150	21.01	21.96	2,021	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.06	0.00	0.01	0.01	0.00	0.00	0.23	0.01	0.32
Ink (Gold)-38214	17.97	21.96	1,728	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.05	0.00	0.01	0.01	0.00	0.00	0.19	0.00	0.27
Ink (Gold)-51974	16.50	21.96	1,587	3.7%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				5.73	0.05	0.00	0.01	0.01	0.00	0.00	0.18	0.00	5.99
Ink (Gold)-52034	16.30	21.96	1,567	4.4%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				6.79	0.05	0.00	0.01	0.01	0.00	0.00	0.18	0.00	7.05
Ink (Gold)-53288	21.14	21.96	2,033	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.06	0.00	0.01	0.01	0.00	0.00	0.23	0.01	0.32
Ink (Gold)-53289	16.01	21.96	1,540	2.5%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				3.78	0.05	0.00	0.01	0.01	0.00	0.00	0.17	0.00	4.02
Ink (Gold)-54580	16.57	21.96	1,594	2.7%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				4.26	0.05	0.00	0.01	0.01	0.00	0.00	0.18	0.00	4.52
Ink (Gold)-54807	15.25	21.96	1,467	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.05	0.00	0.01	0.01	0.00	0.00	0.16	0.00	0.23
Ink (Gold)-54919	21.96	21.96	2,112	0.0%	0.03%	0.00%	0.00%	0.01%	0.00%	0.00%	0.11%	0.00%	
(As Applied)				0.00	0.07	0.00	0.01	0.01	0.00	0.00	0.24	0.01	0.34
Single Worst HAP (Controlled) Emissions				6.79	0.07	0.00	0.01	0.01	0.00	0.00	0.24	0.01	

Note: The emissions calculated are already after control.

Total Potential Air Toxics Emissions (as applied by the applicator): See Page 6 of 6

Methodology:

All material usages are mutually exclusive.

Total Potential Air Toxic Emissions is the maximum ink or coating used, based on 8,760 hours of operation per year.

All inks and coatings reflect "as applied" by the applicator.

Annual Usage = Amount Used per Unit (lb/unit) * Production Units per Hour * 8,760 (hrs/yr) * (1/2000) (ton/lb) (unit = MMin^2)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic * (1- control efficiency) [To stay below 40 tons/yr VOC, the source requires a minimum overall efficiency of 86%.

The source however, has an overall control system of 90.25% (95% capture * 95% destruction eff.). 90.25% will be used in the HAPs calculations.

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

Air Toxics Emissions Calculation Spreadsheet
Innovative Packaging Solutions
Aida De Guzman
May 13, 1996
Page 2 of 6

ink Name	Amount used per unit (lb/unit)	Production units per hour (units/hr)	Annual Usage (tons/yr)	Dibutyl Phthalate Weight % (tons/yr)	Toluene Weight % (tons/yr)	Ethyl Benzene Weight % (tons/yr)	MIBK Weight % (tons/yr)	Hexane Weight % (tons/yr)	Diethyl Hexyl Phthalate Weight % (tons/yr)	Xylene Weight % (tons/yr)	Methanol Weight % (tons/yr)	MEK Weight % (tons/yr)	All Toxics (tons/yr)
Ink-37812	21.79	21.96	2,096	0.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				0.00	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	0.50
Ink-51973	21.79	21.96	2,096	3.5%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				7.20	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	7.70
Ink-52047	21.79	21.96	2,096	2.4%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				4.96	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	5.46
Ink-52056	21.79	21.96	2,096	2.4%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				4.96	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	5.46
Ink-52066	21.79	21.96	2,096	0.7%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				1.49	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	1.99
Ink-52113	21.79	21.96	2,096	0.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				0.00	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	0.50
Ink-52114	21.79	21.96	2,096	2.4%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				4.96	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	5.46
ink-52403	21.79	21.96	2,096	3.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				6.20	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	6.70
Ink-52508	21.79	21.96	2,096	2.3%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				4.71	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	5.21
ink-52609	21.79	21.96	2,096	3.5%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				7.07	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	7.57
Ink-52854	21.79	21.96	2,096	3.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				6.20	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	6.70
Ink-52955	21.79	21.96	2,096	0.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				0.00	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	0.50
Ink-53080	21.79	21.96	2,096	2.6%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				5.33	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	5.83
Ink-53286	21.79	21.96	2,096	1.3%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				2.61	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	3.11
Ink-53287	21.79	21.96	2,096	0.0%	10.00%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				0.00	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	0.50
Ink-53314	21.79	21.96	2,096	1.8%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.60	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	4.10
Single Worst HAP (Controlled)	Emissions			7.20	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	

Total Potential Air Toxics Emissions (as applied by the applicator): See Page 6 of 6

Methodology:

All material usages are mutually exclusive.

Total Potential Air Toxic Emissions is the maximum ink or coating used, based on 8,760 hours of operation per year.

All inks and coatings reflect "as applied" by the applicator.

Annual Usage = Amount Used per Unit (lb/unit) * Production Units per Hour * 8,760 (hrs/yr) * (1/2000) (ton/lb) (unit = MMin^2)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic * (1- control efficiency) (overall Control Efficiency = 90.25%)

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

Air Toxics Emissions Calculation Spreadsheet
Innovative Packaging Solutions
Aida De Guzman
May 13, 1996
Page 3 of 6

ink Name	Amount used per unit (lb/unit)	Production units per hour (units/hr)	Annual Usage (tons/yr)	Dibutyl Phthalate Weight % (tons/yr)	Toluene Weight % (tons/yr)	Ethyl Benzene Weight % (tons/yr)	MIBK Weight % (tons/yr)	Hexane Weight % (tons/yr)	Diethyl Hexyl Phthalate Weight % (tons/yr)	Xylene Weight % (tons/yr)	Methanol Weight % (tons/yr)	MEK Weight % (tons/yr)	All Toxics (tons/yr)
Ink-53365	21.79	21.96	2,096	1.7%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.47	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	3.97
Ink-53366	21.79	21.96	2,096	3.9%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				7.94	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	8.44
Ink-53367	21.79	21.96	2,096	3.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				6.08	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	6.58
Ink-53368	21.79	21.96	2,096	1.9%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.85	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	4.35
Ink-53369	21.79	21.96	2,096	1.6%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.23	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	3.73
Ink-53928	21.79	21.96	2,096	1.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				1.99	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	2.49
Ink-53932	21.79	21.96	2,096	1.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				1.99	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	2.49
Ink-53937	21.79	21.96	2,096	1.7%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.47	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	3.97
Ink-53940	21.79	21.96	2,096	1.7%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.47	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	3.97
Ink-54161	21.79	21.96	2,096	1.9%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				3.97	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	4.47
Ink-54413	21.79	21.96	2,096	0.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				0.00	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	0.50
Ink-54564	21.79	21.96	2,096	4.7%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				9.55	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	10.05
Ink-54566	21.79	21.96	2,096	3.8%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				7.82	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	8.32
Ink-54588	21.79	21.96	2,096	4.1%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				8.31	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	8.81
Ink-54815	21.79	21.96	2,096	0.0%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.17%	0.00%	
(As Applied)				0.00	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	0.50
Single Worst HAP (Controlled)	Emissions			9.55	0.10	0.00	0.01	0.02	0.01	0.00	0.35	0.01	

Total Potential Air Toxics Emissions (as applied by the applicator): See Page 6 of 6

Methodology:

All material usages are mutually exclusive.

Total Potential Air Toxic Emissions is the maximum ink or coating used, based on 8,760 hours of operation per year.

All inks and coatings reflect "as applied" by the applicator.

Annual Usage = Amount Used per Unit (lb/unit) * Production Units per Hour * 8,760 (hrs/yr) * (1/2000) (ton/lb) (unit = MMin^2)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic * (1- control efficiency) (Control Efficiency = 95% Capture * 95% Destruction = 90.25%)

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

Air Toxics Emissions Calculation Spreadsheet
Innovative Packaging Solutions
Aida De Guzman
May 13, 1996

ink Name	Amount used per unit (lb/unit)	Production units per hour (units/hr)	Annual Usage (tons/yr)	Dibutyl Phthalate Weight % (tons/yr)	Toluene Weight % (tons/yr)	Ethyl Benzene Weight % (tons/yr)	MIBK Weight % (tons/yr)	Hexane Weight % (tons/yr)	Diethyl Hexyl Phthalate Weight % (tons/yr)	Xylene Weight % (tons/yr)	Methanol Weight % (tons/yr)	MEK Weight % (tons/yr)	All Toxics (tons/yr)
Lacquer/Vanish-50743	21.79	21.96	2,096	2.6%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				5.31	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	5.77
Lacquer/Vanish-51782	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	0.46
Lacquer/Vanish-52111	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	0.46
Lacquer/Vanish-52957	21.79	21.96	2,096	3.3%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				6.64	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	7.10
Lacquer/Vanish-53088	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	0.46
Lacquer/Vanish-53143	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	0.46
Lacquer/Vanish-53358	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	0.46
Lacquer/Vanish-53370	21.79	21.96	2,096	4.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				8.24	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	8.70
Lacquer/Vanish-53514	21.79	21.96	2,096	1.4%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				2.79	0.09	0.00	0.01	0.03	0.01	0.00	0.31	0.01	3.25
Lacquer/Vanish-53515	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	0.45
Lacquer/Vanish-54091	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	0.44
Lacquer/Vanish-54473	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	0.44
Lacquer/Vanish-54590	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	0.44
Lacquer/Vanish-54803	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	0.44
Lacquer/Vanish-55067	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.15%	0.00%	
(As Applied)				0.00	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	0.44
Single Worst HAP (Controlled) Emissions				8.24	0.09	0.00	0.01	0.02	0.01	0.00	0.31	0.01	

Total Potential Air Toxics Emissions (as applied by the applicator): See Page 6 of 6

Methodology:

All material usages are mutually exclusive.

Total Potential Air Toxic Emissions is the maximum ink or coating used, based on 8,760 hours of operation per year.

All inks and coatings reflect "as applied" by the applicator.

Annual Usage = Amount Used per Unit (lb/unit) * Production Units per Hour * 8,760 (hrs/yr) * (1/2000) (ton/lb) (unit = MMin^2)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic * (1- control efficiency) (overall Control Efficiency = 90.25%)

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

Air Toxics Emissions Calculation Spreadsheet
Innovative Packaging Solutions
Aida De Guzman
May 13, 1996

ink Name	Amount used per unit (lb/unit)	Production units per hour (units/hr)	Annual Usage (tons/yr)	Dibutyl Phthalate Weight %	Dibutyl Phthalate (tons/yr)	Toluene Weight %	Toluene (tons/yr)	Ethyl Benzene Weight %	Ethyl Benzene (tons/yr)	MIBK Weight %	MIBK (tons/yr)	Hexane Weight %	Hexane (tons/yr)	Diethyl Hexyl Phthalate Weight %	Diethyl Hexyl Phthalate (tons/yr)	Xylene Weight %	Xylene (tons/yr)	Methanol Weight %	Methanol (tons/yr)	MEK Weight %	MEK (tons/yr)	All Toxics (tons/yr)
Toner Conc.-31004	21.79	21.96	2,096	1.2%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.35		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	2.75
Toner Conc.-37907	21.79	21.96	2,096	0.0%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					0.00		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	0.40
Toner Conc.-38264	21.79	21.96	2,096	1.5%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					3.15		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	3.55
Toner Conc.-50322	21.79	21.96	2,096	1.2%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.35		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	2.75
Toner Conc.-50486	21.79	21.96	2,096	1.8%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					3.76		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	4.16
Toner Conc.-50515	21.79	21.96	2,096	0.0%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					0.00		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	0.40
Toner Conc.-50517	21.79	21.96	2,096	1.7%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					3.57		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	3.97
Toner Conc.-50518	21.79	21.96	2,096	1.2%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.35		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	2.75
Toner Conc.-50522	21.79	21.96	2,096	1.2%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.35		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	2.75
Toner Conc.-50523	21.79	21.96	2,096	1.4%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.82		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	3.22
Toner Conc.-50524	21.79	21.96	2,096	0.9%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					1.88		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	2.28
Toner Conc.-50525	21.79	21.96	2,096	0.0%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					0.00		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	0.40
Toner Conc.-50526	21.79	21.96	2,096	1.2%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.35		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	2.75
Toner Conc.-50527	21.79	21.96	2,096	1.4%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					2.82		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	3.22
Toner Conc.-50755	21.79	21.96	2,096	0.0%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					0.00		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	0.40
Toner Conc.-50756	21.79	21.96	2,096	0.0%		0.04%		0.00%		0.00%		0.01%		0.00%		0.00%		0.14%		0.00%		
(As Applied)					0.00		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	0.40
Single Worst HAP (Controlled)	Emissions				3.76		0.08		0.00		0.01		0.01		0.01		0.00		0.28		0.01	

Total Potential Air Toxics Emissions (as applied by the applicator): See Page 6 of 6

Methodology:

All material usages are mutually exclusive.

Total Potential Air Toxic Emissions is the maximum ink or coating used, based on 8,760 hours of operation per year.

All inks and coatings reflect "as applied" by the applicator.

Annual Usage = Amount Used per Unit (lb/unit) * Production Units per Hour * 8,760 (hrs/yr) * (1/2000) (ton/lb) (unit = MMin^2)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic * (1- control efficiency) (Control Efficiency = 95% Capture * 95% Destruction = 90.25%)

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

Air Toxics Emissions Calculation Spreadsheet
Innovative Packaging Solutions
Aida De Guzman
May 13, 1996

Coating or Solvent	Amount used per unit (gal/unit)	Production units per hour (units/hr)	Annual Usage (gal/yr)	Dibutyl Phthalate Weight % (tons/yr)	Toluene Weight % (tons/yr)	Ethyl Benzene Weight % (tons/yr)	MIBK Weight % (tons/yr)	Hexane Weight % (tons/yr)	Diethyl Hexyl Phthalate Weight % (tons/yr)	Xylene Weight % (tons/yr)	Methanol Weight % (tons/yr)	MEK Weight % (tons/yr)	All Toxics (tons/yr)
Toner Conc.-51428	21.79	21.96	2,096	1.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				2.02	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	2.42
Toner Conc.-52400	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Toner Conc.-52824	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Toner Conc.-53042	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Toner Conc.-53371	21.79	21.96	2,096	1.3%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				2.59	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	2.98
Toner Conc.-53416	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Toner Conc.-54861	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Additive-51659	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Catalyst-54370	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Extender-50742	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Extender-51816	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Extender-52493	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Extender-53102	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Extender-53144	21.79	21.96	2,096	0.0%	0.04%	0.00%	0.00%	0.01%	0.00%	0.00%	0.14%	0.00%	
(As Applied)				0.00	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	0.40
Single Worst HAP (Controlled)	Emissions			2.59	0.08	0.00	0.01	0.01	0.01	0.00	0.28	0.01	
Note: The througput is for the entire source.													
The Worst Case Ink Controllled Emissions (ton/yr)				**9.55**	**0.10**	**0.00**	**0.01**	**0.03**	**0.01**	**0.00**	**0.35**	**0.01**	**10.05**

Methodology:

All material usages are mutually exclusive.

Total Potential Air Toxic Emissions is the maximum ink or coating used, based on 8,760 hours of operation per year.

All inks and coatings reflect "as applied" by the applicator.

Annual Usage = Amount Used per Unit (lb/unit) * Production Units per Hour * 8,760 (hrs/yr) * (1/2000) (ton/lb) (unit = MMin^2)

Air Toxic Tons per Year = Annual Usage (tons/yr) * Weight % Air Toxic * (1- control efficiency) (Control Efficiency = 95% Capture * 95% Destruction = 90.25%)

Air Toxic Grams per Second = Air Toxic Tons per Year * 0.0287925 (gr-yr/sec-ton)

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Innovative Packaging Solutions
Address City IN Zip: 1405 W. Missouri Street, Evansville, IN 47710
TV: 163-5859
Plt ID: 163-00010
Reviewer: Aida De Guzman
Date: May 13, 1996

THROUGHPUT

Press I.D.	MAXIMUM LINE SPEED FEET/MIN	CONVERT FEET TO INCHES	MAXIMUM PRINT WIDTH INCHES	60 MIN HOUR	8760 HR YEAR	1/1000000	MMin^2/YEAR
Press 7 - Rotogravure	1000	12	30.5	60	8760	1000000	192370

INK VOCS

Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Ink(Gold)-35844	17.01	73.55%	100.00%	192370	2000	1203.27
Ink(Gold)-36374	20.44	61.20%	100.00%	192370	2000	1203.27
Ink(Gold)-37747	21.79	57.40%	100.00%	192370	2000	1203.27
Ink(Gold)-37751	21.61	57.89%	100.00%	192370	2000	1203.27
Ink(Gold)-37867	20.49	61.06%	100.00%	192370	2000	1203.27
Ink(Gold)-38146	17.40	71.90%	100.00%	192370	2000	1203.27
Ink(Gold)-38150	21.01	59.54%	100.00%	192370	2000	1203.27
Ink(Gold)-38214	17.97	69.62%	100.00%	192370	2000	1203.27
Ink(Gold)-51974	16.50	75.80%	100.00%	192370	2000	1203.27
Ink(Gold)-52034	16.31	76.71%	100.00%	192370	2000	1203.27
Ink(Gold)-53288	21.14	59.18%	100.00%	192370	2000	1203.27
Ink(Gold)-53289	16.01	78.12%	100.00%	192370	2000	1203.27
Ink(Gold)-54580	16.57	75.48%	100.00%	192370	2000	1203.27
Ink(Gold)-54807	15.25	82.05%	100.00%	192370	2000	1203.27
Ink(Gold)-54919	21.96	56.98%	100.00%	192370	2000	1203.27
Ink-37812	16.70	74.92%	100.00%	192370	2000	1203.27
Ink-51973	15.95	78.41%	100.00%	192370	2000	1203.27
Ink-52047	15.69	79.75%	100.00%	192370	2000	1203.27
Ink-52056	15.60	80.18%	100.00%	192370	2000	1203.27
Ink-52066	19.23	65.05%	100.00%	192370	2000	1203.27
Ink-52113	15.90	78.68%	100.00%	192370	2000	1203.27
Ink-52114	16.11	77.67%	100.00%	192370	2000	1203.27
Ink-52403	15.43	81.05%	100.00%	192370	2000	1203.27
Ink-52508	15.78	79.27%	100.00%	192370	2000	1203.27
Ink-52609	15.38	81.34%	100.00%	192370	2000	1203.27
Ink-52854	16.19	77.26%	100.00%	192370	2000	1203.27
Ink-52955	16.36	76.49%	100.00%	192370	2000	1203.27
Ink-53080	14.96	83.61%	100.00%	192370	2000	1203.27
Ink-53286	14.68	85.19%	100.00%	192370	2000	1203.27
Ink-53287	15.59	80.24%	100.00%	192370	2000	1203.27
Ink-53314	15.59	80.24%	100.00%	192370	2000	1203.27

METHODOLOGY

Thruput = Max. line speed feet per minute * Convert feet to inches * Max. print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Pounds VOC Applied per MMin^2 (equals to Maximum Coverage Pounds per MMin^2 * Weight % * VOC) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

According to the information provided by Innovative Packaging Solutions , maximum VOC applied per MMin^2 is 2.78 lb/color * maximum 4.5 colors/MMin^2 or 12.51 lb VOC/Min^2.

All material usages for printing press are mutually exclusive.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Innovative Packaging Solutions
Address City IN Zip: 1405 W. Missouri Street, Evansville, IN 47710
TV: 163-5859
Plt ID: 163-00010
Reviewer: Aida de Guzman
Date: May 13, 1996

INK VOCS

Ink Name Press Id	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Ink-53365	15.70	79.66%	100.00%	192370	2000	1203.27
Ink-53366	16.67	75.05%	100.00%	192370	2000	1203.27
Ink-53367	16.72	74.81%	100.00%	192370	2000	1203.27
Ink-53368	17.22	72.65%	100.00%	192370	2000	1203.27
Ink-53369	18.36	68.15%	100.00%	192370	2000	1203.27
Ink-53928	16.40	76.29%	100.00%	192370	2000	1203.27
Ink-53932	15.87	78.83%	100.00%	192370	2000	1203.27
Ink-53937	15.58	80.31%	100.00%	192370	2000	1203.27
Ink-53940	15.95	78.42%	100.00%	192370	2000	1203.27
Ink-54161	16.31	76.68%	100.00%	192370	2000	1203.27
Ink-54413	15.29	81.80%	100.00%	192370	2000	1203.27
Ink-54564	15.05	83.13%	100.00%	192370	2000	1203.27
Ink-54566	15.54	80.52%	100.00%	192370	2000	1203.27
Ink-54588	15.35	81.52%	100.00%	192370	2000	1203.27
Ink-54815	17.80	70.30%	100.00%	192370	2000	1203.27
Lacquer/Varnish-50743	16.62	75.27%	100.00%	192370	2000	1203.27
Lacquer/Varnish-51782	17.89	69.94%	100.00%	192370	2000	1203.27
Lacquer/Varnish-52111	18.83	66.42%	100.00%	192370	2000	1203.27
Lacquer/Varnish-52957	14.53	86.12%	100.00%	192370	2000	1203.27
Lacquer/Varnish-53088	17.06	73.32%	100.00%	192370	2000	1203.27
Lacquer/Varnish-53143	15.81	79.15%	100.00%	192370	2000	1203.27
Lacquer/Varnish-53358	27.79	45.02%	100.00%	192370	2000	1203.27
Lacquer/Varnish-53370	15.48	80.82%	100.00%	192370	2000	1203.27
Lacquer/Varnish-53514	21.15	59.15%	100.00%	192370	2000	1203.27
Lacquer/Varnish-53515	15.11	82.82%	100.00%	192370	2000	1203.27
Lacquer/Varnish-54091	15.19	82.35%	100.00%	192370	2000	1203.27
Lacquer/Varnish-54473	22.50	55.59%	100.00%	192370	2000	1203.27
Lacquer/Varnish-54590	17.42	71.83%	100.00%	192370	2000	1203.27
Lacquer/Varnish-54803	15.49	80.76%	100.00%	192370	2000	1203.27
Lacquer/Varnish-55067	21.99	56.89%	100.00%	192370	2000	1203.27

METHODOLOGY

Thruput = Max. line speed feet per minute * Convert feet to inches * Max. print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year
VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics)
* Flash off * Throughput * Tons per 2000 pounds = Tons per Year
According to the information provided by Innovative Packaging Solutions, maximum VOC applied per MMin^2 is 2.78 lb/color * maximum 4.5 colors/MMin^2 or 12.51 lb VOC/Min^2.
All material usages for printing press are mutually exclusive.

Appendix A: Emissions Calculations
VOC From Printing Press Operations

Company Name: Innovative Packaging Solutions
Address City IN Zip: 1405 W. Missouri Street, Evansville, IN 47710
TV: 163-5859
Plt ID: 163-00010
Reviewer: Aida De Guzman
Date: May 13, 1996

INK VOCS

Ink Name Press ID	Maxium Coverage lbs/ MMin^2	Weight % Volatiles*	Flash Off %	Through Put MMin^2/ Year	Tons 2000 lbs	Tons Year
Toner Conc.-31004	13.88	90.12%	100.00%	192370	2000	1203.27
Toner Conc.-37907	13.66	91.60%	100.00%	192370	2000	1203.27
Toner Conc.-38264	14.21	88.04%	100.00%	192370	2000	1203.27
Toner Conc.-50322	13.89	90.07%	100.00%	192370	2000	1203.27
Toner Conc.-50486	14.08	88.84%	100.00%	192370	2000	1203.27
Toner Conc.-50515	13.74	91.07%	100.00%	192370	2000	1203.27
Toner Conc.-50517	13.92	89.87%	100.00%	192370	2000	1203.27
Toner Conc.-50518	13.89	90.06%	100.00%	192370	2000	1203.27
Toner Conc.-50522	13.77	90.82%	100.00%	192370	2000	1203.27
Toner Conc.-50523	13.82	90.54%	100.00%	192370	2000	1203.27
Toner Conc.-50524	13.55	92.34%	100.00%	192370	2000	1203.27
Toner Conc.-50525	13.53	92.47%	100.00%	192370	2000	1203.27
Toner Conc.-50526	13.60	91.98%	100.00%	192370	2000	1203.27
Toner Conc.-50527	13.90	90.02%	100.00%	192370	2000	1203.27
Toner Conc.-50755	12.82	97.56%	100.00%	192370	2000	1203.27
Toner Conc.-50756	12.82	97.56%	100.00%	192370	2000	1203.27
Toner Conc.-51428	13.81	90.60%	100.00%	192370	2000	1203.27
Toner Conc.-52400	14.02	89.25%	100.00%	192370	2000	1203.27
Toner Conc.-52824	13.91	89.92%	100.00%	192370	2000	1203.27
Toner Conc.-53042	13.74	91.06%	100.00%	192370	2000	1203.27
Toner Conc.-53371	13.85	90.33%	100.00%	192370	2000	1203.27
Toner Conc.-53416	13.59	92.05%	100.00%	192370	2000	1203.27
Toner Conc.-54861	16.00	78.20%	100.00%	192370	2000	1203.27

State Potential VOC Emissions	**1203.27**	**Tons/yr**
State Allowable (min. 60% control per 326 IAC 8-5-5)	**481.31**	**Tons/yr**
Federal Potential VOC Emissions (controlled)	**117.32**	**Tons/yr**

METHODOLOGY

Thruput = Max. line speed feet per minute * Convert feet to inches * Max. print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weights % organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

According to the information provided by Innovative Packaging Solutions, maximum VOC applied per MMin^2 is 2.78 lb/color * maximum 4.5 colors/MMin^2 or 12.51 lb VOC/Min^2.
All material usages for printing press are mutually exclusive.
Controlled Emissions = Uncontrolled Emissions * (1 - 95% * 95%)

Appendix A: Emission Calculations
Natural Gas Combustion Only
MM Btu/hr 0.3 - < 10
Thermal Oxidizer

Company Name:	**Innovative Packaging Solutions**
Address City IN Zip:	**1405 West Missouri Street, Evansville, IN 47710**
CP:	**163-5017**
Plt ID:	**163-00010**
Reviewer:	**Aida De Guzman**
Date:	**December 22, 1995**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
10.5	92.0

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	12.0	12.0	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.6	0.6	0.0	4.6	0.2	1.0

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton